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5 *Counsel for Defendant*
6 *National Center for Safety Initiatives, LLC*

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9 **IN THE UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JASMINE GRACE,

12 Plaintiff,

13 v.

14 NATIONAL CENTER FOR SAFETY
15 INITIATIVES, LLC,

16 Defendant.

Case No.: 2:23-cv-00803-CDS-BNW

17
18 **STIPULATION OF EXTENSION OF TIME FOR DEFENDANT**
NATIONAL CENTER FOR SAFETY INITIATIVES, LLC TO FILE ANSWER

19 Defendant National Center for Safety Initiatives, LLC ("NCSI") has requested an extension
20 of time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff
21 has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND
22 AGREED to by and among counsel, that Defendant National Center for Safety Initiatives, LLC's
23 time to answer, move or otherwise respond to the Complaint in this action is extended from June
24 23, 2023 through and including July 14, 2023. NCSI anticipates using the additional time to
25 investigate Plaintiff's allegations and prepare a meaningful response to the specific allegations, if
26 necessary. Further, counsel for NCIS Plaintiff anticipate engaging in settlement discussions. The

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1 additional time to respond to the Complaint will facilitate these discussions. This stipulation is
2 filed in good faith and not intended to cause delay.

3 Dated: June 21, 2023

Respectfully submitted,

4 BAUMAN LOEWE WITT
5 & MAXWELL, PLLC

6 By: /s/ Michael C. Mills

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*Counsel for Defendant
National Center for Safety
Initiatives, LLC*

15 Dated: June 21, 2023

Agreed & Consented to:

16 CONSUMER ATTORNEYS

17 By: /s/ Michael Yancey III

18 Michael Yancey III, Esq.
19 myancey@consumerattorneys.com
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23 Telephone: (480) 573-9272

*Counsel for Plaintiff
Jasmine Grace*

24 IT IS SO ORDERED:

25 
United States Magistrate Judge

26 DATED: June 22, 2023

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2023, I presented the foregoing STIPULATION OF EXTENSION OF TIME FOR DEFENDANT NATIONAL CENTER FOR SAFETY INITIATIVES, LLC TO FILE ANSWER with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Michael C. Mills
Michael C. Mills
Counsel for Defendant
National Center for Safety
Initiatives, LLC